

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL INSURANCE COMPANY, a
New Jersey Company,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OF
WASHINGTON, INC., a Washington
Corporation,

Defendant.

Case No. 2:22-cv-00963-TL

**STIPULATION AND ~~(PROPOSED)~~
ORDER TO TRANSFER VENUE
PURSUANT TO FRCP 12(b)(3) and 28
U.S.C. § 1404**

Plaintiff Federal Insurance Company and Defendant Expeditors International of Washington, Inc. jointly stipulate, pursuant to 28 U.S.C. § 1404, to transfer this case to the U.S. District Court for the Southern District of New York. The parties request that the Court vacate Defendant's Fed. R. Civ. P. 12(b)(3) motion to transfer venue and enter the proposed order, submitted with this stipulation, authorizing the Clerk to immediately transfer this case to the Southern District of New York.

1 DATED: September 8, 2022

2 LANE POWELL PC

3
4 By: s/ Steven W. Block

5 Steven W. Block, NY State Bar No. 2121259
6 1420 Fifth Avenue, Suite 4200
7 P.O. Box 91302
8 Seattle, WA 98111-9402
9 206.223.7718
10 blocks@lanepowell.com

11 *Attorney for Defendant Expeditors International of*
12 *Washington, Inc.*

13 VI JEAN RENO

14 By: s/ Vi Jean Reno

15 Vi Jean Reno, WSBA No. 9385
16 Law Offices of Vi Jean Reno
17 1420 Fifth Avenue, Suite 3000
18 Seattle, WA 98101
19 206.464-0461
20 vjreno@renolawsea.com

21 *Attorney for Plaintiff Federal Insurance Co.*

ORDER

Pursuant to the parties' Stipulation to Transfer Venue Pursuant to Fed. R. Civ. P. 12(b)(3) and 28 U.S.C. § 1404, it being so stipulated, it is hereby ORDERED that the Clerk shall transfer this case to U.S. District Court for the Southern District of New York under 28 U.S.C. § 1404(a).

IT IS SO ORDERED.

Dated this 9th day of September 2022.



Tana Lin
United States District Judge

Presented by:

LANE POWELL

BY: s/ Steven W. Block

Steven W. Block, WSBA No. 24299

LANE POWELL, PC

1420 Fifth Avenue, 42nd floor

Seattle, Washington 98101

Telephone: (206) 223-7718

Email: blocks@lanepowell.com

*Attorney for Defendant Expeditors
International of Washington, Inc.*

VI JEAN RENO

By: s/ Vi Jean Reno

Vi Jean Reno, WSBA No. 9385

Law Offices of Vi Jean Reno

1420 Fifth Avenue, Suite 3000

Seattle, WA 98101

206.464-0461

Email: vjeanreno@renolawsea.com

*Attorney for Plaintiff Federal Insurance
Co.*